
CANADIAN SEED INSTITUTE
WEED SEEDS ORDER (WSO) WORKSHOP
“SCOPING THE ISSUES”

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OTTAWA, ONTARIO

TABLE OF CONTENTS

1. WORKSHOP OVERVIEW.....	3
2. GETTING STARTED.....	3
Purpose/Process – Current WSO and Review Process.....	3
Regionally Regulated Weeds and Giant Foxtail.....	4
Invasive Plant Policy Development at CFIA-ACIA.....	5
Pest Risk Assessment Process.....	7
Review of Other Regulated Species Lists.....	8
Provincial Lists and CSGA Objectionable and Difficult to Separate.....	8
United States Weed Regulations.....	8
International Lists.....	8
3. POTENTIAL CHANGES/ENHANCEMENTS.....	9
Proposed Revised Class Descriptions & Species Shifts.....	9
4. THE PATH FORWARD.....	12
Next Steps for Review of WSO.....	12
5. APPENDIX 1: TABLE BOOKS.....	14
6. WORKSHOP PARTICIPANTS.....	16

WORKSHOP OVERVIEW

The Canadian Seed Institute (CSI) convened a workshop on October 29, 2008 with approximately 35 participants representing provincial governments, seed growers, the seed trade, seed analysts and CFIA.

The meeting is one result of a successful funding application by the Canadian Seed Trade Association, the Canadian Seed Growers' Association (CSGA) and the Canadian Seed Institute to the Advancing Canadian Agriculture and Agri-food Fund (ACAAF) of Agriculture and Agri-Food Canada. The ACAAf funding makes possible policy work under the National Forum on Seed (NFS) as well as technical work such as this meeting.

The objectives of the meeting were to develop recommendations for the revision of the *Weed Seeds Order (WSO)* by:

- 1) increasing understanding of the role and content of the current WSO;
- 2) revising definitions for Classes 1 to 6 and/or developing a path forward to finalize:
 - a) Removal of species from Class 1,
 - b) Increased standards for Class 2; and,
- 3) clarifying the next steps in the WSO review process.

GETTING STARTED

PRESENTATION *Current WSO and Review Process* *Anita Gilmer, CFIA*

The presentation began with an overview of Canada's WSO and the history leading up to this meeting. The first federal weed legislation was the *Seed Control Act* of 1905, which was enacted to assure relative freedom from weed seeds in Canada's seed supply. Prior to 1960, weed seed standards resided within the *Seeds Regulations*. In 1960 the *Weed Seeds Order* was created, listing weed seeds in six classes, and this structure remains today. Descriptions of each class are considered policy and can be changed without amendments to the *Seeds Regulations*.

WSO classes are currently defined as follows;

Class 1: Prohibited Noxious

- Potentially serious weeds in at least part of Canada
- Not native to Canada
- If in Canada, have not reached the limits of their ecological range
- Difficult to eradicate or control once established
- No seed shall contain these species

Class 2: Primary Noxious

- Potentially serious weed in at least part of Canada, but permitted at low levels in the lowest grade of seed
- Either native to Canada or have reached the limits of their ecological range
- Difficult to eradicate or control by good cultural practices once established in cultivated fields
- Allowed at low levels and applies to all tables except XIV and XV

Class 3: Secondary Noxious

- Have the potential to be a serious weed in certain crops but are permitted at low levels
- Relatively easy to eradicate or control in certain fields
- Applies to all but Tables XIV and XV

Class 4: Secondary Noxious

- All species in Class 3, plus a few additional
- Applies to Table XII Turf

Class 5: Noxious

- Lawn mixtures and Ground Cover mixtures have their own list of noxious species because of the unique nature of these mixes

Class 6: Other Weed Seeds

- Seeds of all other species not listed as crop kinds in Schedule I to the *Seeds Regulations*

Classes 3, 4 and 5 apply to different crop types.

In 1986, 21 species were added to Class 1 and minor changes were made to the other classes. The last significant revision to the WSO was in 2005 as a result of the Seed Standards Review. At that time thirteen native species were deleted from Class 1, and four species were added. Three species were added and two species deleted from Classes 2 to 5. Three species were re-classified.

The CFIA has developed a Seed Strategic Action Plan which includes revision and updating of the WSO. Ms. Gilmer said this meeting is an important opportunity to gather input and guidance on proposed changes to the WSO.

Regionally Regulated Weeds

Cereal crops are required to be free of tartarian buckwheat in Manitoba, Saskatchewan, Alberta and British Columbia. As well, cereal crops are to be free of wild oats in Quebec, Nova Scotia, New Brunswick and Prince Edward Island. Canola and mustard crops are to be free of seeds of cleavers.

Giant Foxtail (GF) Reclassification

Ms. Gilmer explained the change process required to reclassify a species, describing the Giant foxtail example.

Following stakeholders' expression of concern that Giant Foxtail (*Setaria faberi*) had become widely distributed and no longer fit the Class 1 description, a biological review of the species was requested from CFIA's Plant Health Risk Assessment Unit. In April of 2008 CFIA consulted with seed stakeholders and subject matter experts regarding the proposed reclassification. From July 4 to August 15, 2008 all Canadians were consulted via the CFIA website. There emerged general consensus that GF no longer fits the Class 1 description. CFIA is moving forward with a recommendation to move GF from Class 1 to Class 2. If this recommendation receives Ministerial approval, pre-publication of the proposal in *Canada Gazette*, Part I (for a thirty to one hundred and twenty day period) would be expected shortly thereafter. The reclassification comes into effect after publication in *Canada Gazette*, Part II.

The role of the WSO in invasive plant management was presented. Seed is an important vector for invasive plants. All imported and domestic seed must comply with the *Seeds Regulations* and may not contain Class 1 Prohibited noxious species. Controlling weedy species at import in this manner is an effective risk prevention tool. The role of the WSO in invasive plant management is limited in that it only applies to anything used to grow a plant and does not include commodities such as hay, feed and grain.

DISCUSSION

The Class 1 Prohibited Noxious definition was discussed. An important consideration is whether this definition needs to be consistent with the International Plant Protection Convention (IPPC), which is under the Food and Agriculture Organization (FAO) of the United Nations (UN), and to which Canada is a signatory.

Participants commented on changing factors in weed management that should be taken into account. Current and proposed provincial pesticide regulations (e.g. Ontario's proposed Bill 64 restricting cosmetic pesticide use), may restrict the use of herbicides in some situations resulting in some weeds no longer being "easily eradicated or controlled". The use of herbicide tolerant gene technology may make weed control options simpler in some agricultural crops. Herbicide tolerant weed biotypes have been confirmed in several weed species.

Meeting participants discussed possible pathways contributing to the dispersion of Giant foxtail.

On the matter of invasive plant management, the role of the WSO was further discussed. The historic role of the WSO has focused on cultivated crops but has never excluded plants of natural areas (e.g. purple loosestrife).

PRESENTATION *Invasive Plant Policy Development at CFIA*

***Christine Tibelius CFIA
Wendy Asbil, CFIA***

Dr. Tibelius outlined *An Invasive Alien Species Strategy for Canada* introduced in 2004. Its purpose is to minimize the risk of invasive alien species to the economy, environment and society.

Invasive plants are harmful species of plants whose introduction or spread threaten the environment, the economy, or society, including human health. They may originate from other countries or from within Canada. They may include locally or regionally established species that are spreading to new areas or becoming more serious. Canada needs an invasive plant policy because invasive plants are one of the greatest threats to croplands, rangelands and natural areas in Canada. As well, there is increasing international concern about invasive plants, resulting in restrictions on Canadian plant products destined to foreign markets.

Regulatory tools for invasive plants include the *Plant Protection Act and Regulations*, the *Seeds Act* and *Weed Seeds Order*. The CFIA Invasive Plant Program Integration Section is coordinating a science-based approach to managing the risks associated with invasive plants, focused on preventing their introduction, spread and impacts. It is consistent with international rules and agreements, including the IPPC. The current

plant health decision-making process for regulation of plant pests includes a Pest Risk Analysis (PRA) as outlined under the IPPC. This process includes a science based risk assessment followed by the evaluation and selection of options to manage the pest. It includes consultation with stakeholders and international notification. The result is a decision that is communicated in a Risk Management Document or a Plant Health Directive.

Ms. Asbil explained that CFIA has been regulating pests of plants for many years and is now developing processes specifically for analyzing potentially invasive plants. The Grains and Oilseeds Section at the CFIA is proposing the following process for discussion:

- Regulation of weeds that meet the definition of a quarantine pest under the *Plant Protection Act* and *Regulations*
- Greater oversight of grain and field crop commodity imports for the presence of regulated weed species
- Screening of new species intended for import for their potential to become weeds in Canada
- Consideration of Woolly cup grass, jointed goatgrass and other species for regulation under the *Plant Protection Act*.

The proposed elements of the process would be as follows:

- A PRA for a plant as a pest is requested and completed.
- Based on PRA outcomes, a plant species is proposed for regulation under the *Plant Protection Regulations*.
- Phytosanitary documentation may be required.
- Domestic movement of contaminated grains and field crops could be restricted.

The intended results would be:

- Prevention: Entry of new invasive plants is managed in a risk-based manner.
- Early detection: New invasive plants and the spread of domestic invasive plants are detected quickly within Canada.
- Response planning: Plans are in place to respond to new invasions.
- Engagement: Increased cooperation and awareness among stakeholders.

DISCUSSION

Several participants observed that the invasive plant program includes in its definitions impacts on human health. The need for synergies between WSO and the invasive plant program is critical.

Concern was expressed about seed coming into Canada via web-based orders, particularly seed for cover crops or floral pasture. All seed entering Canada must comply with section 7 (1) (a) and be free of prohibited noxious weeds. However there is currently an exemption to the requirement to supply certificates of analysis for small lots of seed. The suggestion was made that small volumes be held to the same level of scrutiny as large volumes of seed coming across the border. Ms. Gilmer informed the group that CFIA has recently increased monitoring of small imported lots.

Another area of discussion was around compensation or financial support for growers if a future invasive plant policy results in crops or land being quarantined. The rationale for this is that if the CFIA wants growers to report pests in their crops, they need to know that they will receive compensation and support if their crops are quarantined. This is not only a financial issue, but also a legal liability issue.

One participant suggested that CFIA take a serious look at vegetable seeds coming across Canada's southern border.

PRESENTATION

Pest Risk Assessment Process

Ken Allison, CFIA

Mr. Allison presented an overview of the three-stage risk assessment process for plant pests. Participants at the meeting were being asked to consider this type of process for adding species to the WSO.

Risk assessment is an evaluation of the probability of the introduction and spread of a pest and the associated potential economic consequences. It is used to determine whether a pest is a quarantine pest under the IPPC definition, to characterize the risks associated with the spread or introduction of a pest in terms of likelihood and impact, and to present technical information in a way that can be used to make regulatory decisions.

A quarantine pest is a pest of potential economic importance to the area endangered and not yet present there, or present but not widely distributed and being officially controlled. A regulated non-quarantine pest is an organism whose presence in plants for planting affects the intended use of those plants with an economically unacceptable impact, and which is therefore regulated within the territory of the importing contracting party.

Stage 1 of the risk assessment is initiation; it can be pest-initiated, pathway initiated, or policy initiated. Stage 2 consists of five steps: pest categorization; assessment of the probability of introduction and spread; impacts on crop yield, commodity quality, loss of markets and the environment; overall assessment of risk; and uncertainty. Stage 3 is the calculation of an overall risk rating. If the rating is negligible, no specific phytosanitary measures are generally necessary. However, if risks are identified, specific phytosanitary measures may be necessary to bring the risk down to an acceptable level for Canada.

DISCUSSION

Following the first series of presentations, participants were asked to consider whether a pest risk analysis should be required in order to make additions to Class 1 and Classes 2-5 of the WSO; and whether they have advice on the Invasive Plants Policy.

Overall, there was general agreement that an assessment has some utility for adding weeds to the WSO, particularly for Class 1, but adaptations would be required.

There was discussion about agricultural versus environmental impacts. Under the assessment described by Mr. Allison, equal weight is given to both, so one adaptation could be that these impacts be assessed separately for purposes of the WSO. One

participant noted that since the purpose of the WSO is to protect seed for planting, it would make sense to put more weight on agricultural impacts.

Other proposed adaptations:

- Include the economic impact of the mechanical process needed to mitigate the problem.
- Give weight to the probability of the weed occurring in specific crops.

One participant cautioned that CFIA needs to be careful about the weeds that go into Class 1. For instance, if the CSGA declines a crop with Giant Foxtail and it is now present in 25 percent of all soybean crops in Quebec, that's a huge impact.

Review of Other Regulated Species Lists

PRESENTATION *Provincial Lists and CSGA Objectionable and Difficult to Separate*

Anita Gilmer, CFIA

Ms. Gilmer gave a quick overview of the provincial weed lists, and the CSGA Objectionable and Difficult to Separate Weeds, both of which were provided as handouts. Weed legislation in the provinces of Alberta, Manitoba, Québec, and Saskatchewan, is currently in stages of revision.

PRESENTATION *United States Weed Regulations*

Mike Scheffel, CFIA

Mr. Scheffel provided an overview of U.S. federal and state weed regulations. The differences between the Canadian and U.S. systems were highlighted. In Canada the federal government regulates seed quality and labelling, whereas in the U.S. each state regulates seed quality and labelling. U.S. inter-state transported seed must comply with the seed regulations in the receiving state; there is no comparable Canadian provincial seed regulation. In Canada, provincial weed lists function mainly to regulate weeds growing as plants. In the U.S. state weed lists function mainly to regulate weed seeds in commercial seed. A comparison of weeds listed in each Canadian province with the weeds listed in bordering states was presented.

PRESENTATION *International Lists*

David Ladd, CFIA

Mr. Ladd provided an overview of international weed seed regulations. He outlined weed seed regulations and noxious weeds lists for the European Union, India, South Africa, Australia and New Zealand.

DISCUSSION

Participants were asked to consider whether there are concepts in weed legislation in other jurisdictions that could be incorporated into Canada's approach.

It was acknowledged that there is useful scientific work from other jurisdictions. Timely risk assessments is a real concern. It was suggested that scientific information from

assessments done in other jurisdictions be recognized as valid in a Canadian assessment.

Currently, if a new species is being imported as seed, it generally isn't regulated unless it is listed as a Class 1 species on the WSO. Participants expressed concern that unwanted species not yet identified as such, or not yet listed as Class 1 would be permitted entry into Canada. A policy is currently being developed to address this concern.

One participant suggested a decision tree like the Australian model to help build synergies among the various acts involved in regulating Canada's industry. This also would provide greater transparency in the regulatory environment.

Some provincial representatives described their current use of a pest risk assessment-type process. Quebec has one similar to that of CFIA. A new law in Quebec allows the provincial government to control the movement of weed seeds. Alberta is planning to use a risk assessment process and Manitoba is using a risk assessment process to some extent. Saskatchewan does not. The view was expressed that provincial laws need to be harmonized with federal law.

POTENTIAL CHANGES/ENHANCEMENTS

PRESENTATION *Proposed Revised Class Descriptions & Species Shifts* ***Anita Gilmer, CFIA***

Ms. Gilmer presented proposals for revised class descriptions and species shifts within the WSO.

- Align the IPPC Regulated Quarantine Pest description with Class 1 under the WSO. The proposed description: "The species must have identifiable seeds that can be separated from those of other species. The species must be a weed of potential economic importance to Canada. This determination would be based on a weed risk assessment. The species is not yet present in Canada, or is present but not widely distributed and being officially controlled."
- Move those species currently in Class 1 that are now considered to be widely distributed to Class 2 or lower. Some examples include Leafy spurge, Russian knapweed and Jimsonweed.
- Add additional species to Class 1, specifically those which have undergone a pest risk assessment and which present a significant risk to Canada, species of concern in similar climatic areas, species of concern to trading partners, and species of concern to the United States Department of Agriculture (USDA).
- Change the Class 2 Primary Noxious description to as follows: "The species must have identifiable seeds that can be separated from those of other species. The species must be a weed whose presence in seed affects the intended use of that seed lot with an economically unacceptable impact. This determination would be based on a weed risk assessment."

- Consider applying Class 2 Primary Noxious to all grade tables in Schedule 1 (currently does not apply to Tables XIV and XV).
- Adjust grade table allowances for Class 2 species to zero or near zero.
- Consider whether all Class 2 species are correctly categorized.

Ms. Gilmer also asked participants to consider these questions:

- Should the WSO expand to include species of potential harm to natural areas?
- Are there species that participants would like to have considered for the WSO?
- Should all WSO species be defined to the species level?

She emphasized that nothing has been predetermined and all ideas are welcome.

DISCUSSION

Emerging from the discussion was general agreement that the class system is fundamentally a good approach, and that a pest risk assessment-like approach would be useful in evaluating Class 1 species. There was further agreement that some Class 1 species could be moved to Class 2 or even to other classes. Participants provided feedback that yellow star thistle and Red bartsia are not widely distributed. Most participants felt that the list of Class 1 Prohibited Noxious weeds needs to be short since there is zero tolerance for those species.

Participants devoted considerable time to refining Class 1 and 2 definitions. Participants questioned if the Class 1 definition aligns with IPPC quarantine pest definition, would reporting a prohibited noxious weed in a field trigger quarantine-type action. While the CFIA emphasizes that the WSO is for the purpose of grading seed, and that a revised Class 1 list would contain only species not known to be present in Canada, some participants continued to express concern.

It was noted that normal agronomic practice is to rotate crops. Weedy species listed in Classes 3 to 5 are restricted based on crop type; therefore a weed could be introduced in one crop and then become a problem in a subsequent crop.

The terms “identifiable”, “economically unacceptable impact”, “officially controlled” and “widely distributed” were identified as in need of refinement or further clarification.

There was discussion about whether the regulations should be broadened to include not only seed as a vector of weed seeds, but also to growing plants themselves. “Seed” is defined in the *Seeds Act* as “any plant part of any species belonging to the plant kingdom, represented, sold or used to grow a plant”. Imported seed is regulated, but weeds growing in a field are not subject to the *Seeds Regulations* and therefore the WSO. The invasive plant policy, currently under development, hopes to address this regulatory gap.

There was a useful discussion about the lower classes. The question was posed: Do we need these classes? One participant said that in terms of seed grading, the major need is to distinguish between Classes 2 and 3. While the distinction among the lower classes is crop type, one participant questioned whether the differences among crops could be

put into the grade tables instead of having lower classes. Another participant expressed concern that if that were the case, there would be no indication of how that seed might be used. In one application there may be no problem, but in another application there could be impacts.

There was a good discussion on the rationale to keep, add or remove species from the WSO. Giant hogweed was suggested as an addition to Class 1 if it could be determined whether it is being officially controlled. CFIA also took note that there needs to be follow-up work on the extent to which yellow star thistle and red bartsia exist. CFIA welcomes further input from participants and stakeholders regarding movement of species within the WSO.

Of note was a comment from a participant concerned about the handling of screenings from seed cleaning. In Quebec, for example, the screenings go to animal feed or bedding, which can lead to the spread of weed seeds. There appears to be a lack of regulation of this practice. A CFIA representative confirmed that while the *Plant Protection Act* can deal with the disposal of screenings from imported seed, it has no jurisdiction around screenings from domestic seed cleaning.

On the issue of unidentified seeds, one participant noted that seeds need to be identified at least to the genus level and at times to the species level before they are allowed into Canada in order to avoid economic and/or human/animal health impacts. The technology exists to do this.

THE PATH FORWARD

PRESENTATION

Next Steps for Review of WSO

Anita Gilmer, CFIA

Ms. Gilmer provided a brief overview of the next steps in the review of the WSO. She thanked participants for their valuable contributions and committed to continuing to move the process forward. She expressed CFIA's willingness to work with all provinces on their seed regulations.

DISCUSSION

Participants engaged in a useful discussion about meeting outcomes and next steps. In summary, there was general agreement around these points:

- The WSO needs revision, and it should be aligned with the weed seed policies of CFIA.
- A more systematic approach is needed for determining the placement of species within the classes of the WSO. The PRA process could have utility in this regard, but it would require some modification.
- Class definitions need to be aligned with that of the IPPC, though CFIA notes concerns about what that might mean in terms of quarantine and compensation.
- As a result of the discussions, these revised definitions are proposed:

Class 1

The species must have identifiable seeds that can be separated from those of other species. The species must be a weed whose presence in seed could affect the value and/or intended use of the seed; and/or could have potential impact on human or animal health. This determination would be based on a PRA-type process. The species is not yet present in Canada, or is present but has not reached its full ecological range and is being officially controlled, that is, controlled by the federal government or by a government-authorized agency or organization.

Class 2

The species must have identifiable seeds that can be separated from those of other species. The species must be a weed whose presence in seed could affect the intended use of that seed lot and could significantly affect the value of the seed. This determination would be based on a PRA-type process. The seed is present in Canada and has not reached its full ecological range.

- Under these definitions, most species currently in Class 1 would move to Class 2 or lower.
- Possibly the lower classes could be collapsed, but participants were mindful that they are crop-specific.

Next Steps

- This report will be circulated to all participants.
- Participants are invited to provide CFIA with information and recommendations around the placement of species within the WSO. The document titled "Background biological information on species or groups of species listed on the WSO" can be referenced as a starting point for comments.
- During the winter of 2008/9 a draft proposal will be developed based on the feedback from this meeting and other consultations.

- In about February 2009, meeting participants engage in another consultation workshop based on the proposal. Alternatively, an email-based consultation could occur.
- Following that, CFIA plans to conduct a broad-based consultation with Canadians via the CFIA webpage.
- CFIA will follow the regulatory change process leading to *Canada Gazette*.

At the close of the meeting, participants were asked to provide feedback on the day's discussions. Most said the meeting went well and was a very worthwhile exchange of views from industry, university research, scientists and provincial institutions. There was a general sense that the input they provided will be helpful in amending regulations.

APPENDIX 1: TABLE BOOKS

Question 1: Should CFIA proceed with a new definition for Class 1 and reclassification of wide-spread species?

- Terms need to be clearly defined
 - Eg. “not native to Canada” vs. “Not present in Canada”
 - “weed of economic importance”
 - “Localized” vs. “Not widely distributed”
 - “economically unacceptable” is difficult term
- Definitions need to be clearly written and decided before proceeding to review classification of the species
- The term “separated” needs to be better defined. Does it mean weed seed within seed or does it mean ability to separate by use of herbicide, or does it mean separate by mechanical cleaning after harvest. It could also refer to the ability to separate at the molecular or DNA level.
- Is widely distributed the same as endemic?
- Regional concerns need to be addressed
- old definition includes consideration for “difficulty to eradicate”
- human/animal health needs to be clearly addressed in definition
- there needs to be synergy between Class 1 definition and invasive plant program definitions
- Decision tree would be useful in determining classification of species
- Class 1 should be a small list (max. of <6), and then Class 2 should be tightened up
- Class 1 should align with Plant Health
- Disagreement on using the IPPC definition
- Class 1 designation protects the whole country
- A ‘strong’ definition of Class 1 helps us sell seed internationally.
- Species that have shown to historically be a problem in other countries should be added to Class 1
- Once a weed becomes established it becomes a management issue and should be removed from Class 1.
- Class 1 list should cover the entire value chain (seed, grain, plants)

Question 2: Should standards for Class 2 be increased and Class 2 apply to all tables of Schedule 1?

- As definitions of Classes 1 and 2 are changed, Class 2 standards will need to be tightened
- Some prefer the old definition but would like it changed to “have not reached limits of ecological range”, therefore standards would have to be increased
- Class 2 should be a tight list and “widely distributed” should be part of the definition
- How will economic consequences be quantified?
- Class 2 and 3 need to be clearly distinguished
- Remove the word noxious. It appears in each Class and therefore is confusing.
- Once a weed becomes established it becomes a management issue and should fall out of Class 1

Other Comments:

- Should consider changing titles of classes to better reflect the class definition
- Concern was expressed regarding deer mixes
- Concern was expressed that if Class 1 definition was changed to be more in line with quarantine pest definition, then impact for growers/seed sector could be more serious
- There is a need to consider the impact on grain handlers if implementing weed content control in grain. Control in seed may be enough
- Definitions will help the formal process
- Don't want to regulate everything carte blanche. Need to be seed vector specific.
- Seed vs. plant - Seeds Act doesn't apply to the plant
- Add to definition of Class 3 that it is crop specific
- Different weeds for different crops –need to consider crop rotations
- How to quantify economic consequences
- The barcoding of species project (U of G) may have applications to distinguish species.
- Can the WSO address the problem of the growing number of herbicide tolerant weedy biotypes.
- Industry can sell any (non Class 1) species as pure or mixture, but must meet weed species restrictions for grade table that applies, based on seed size.
- Class 3-5 – no longer IPPC, seed quality issue
- Turf industry has specific needs. Don't harm this industry with changes.
- Lawn mixtures have unique weed concerns considering the crop is regularly mowed. These crops are not food or feed.
- Important to remember that possible additions to the WSO need to be something that is transmitted by seed.
- Term 'identifiable' is open to interpretation – visually distinguishable, DNA identification (to what level – molecular, visual plant, seed).
- Screenings need to be more tightly controlled. Some regulations need to address transport, feeding, use for bedding, and disposal of screenings.
- Consider preventing the inter-provincial trade of Common seed as a means to address the movement of weed seeds across provincial borders. As the main market for common seed is local it may reduce weed seed dispersion.
- Consider human health i.e. allergens or toxic substances that may occur in weeds.
- Continuity gives credibility.
- Consider concerns of organic growers.
- Utilize Grade Table footnotes for weed standards (some disagreement).
- Some customers want to buy weeds i.e. quackgrass.
- Consolidate to one Class of weeds with stipulations, then put them into the Grade Tables.
- Consider impact of changes on the industry.
- Industry (i.e. SIRAs and private seed labs) could play a role by informing CFIA of new or unknown species found in seed.
- Groundcover mixtures provide a product for a certain use. Allows for sale of seed that can't meet other standards. Otherwise, this seed would be sold in the 'underground' market.

Species Specific Information

- Giant hogweed – possibly a Class 1 or 2 addition
- Johnson Grass – shouldn't be Class 1
- Couchgrass, cleavers, cockle – difficult to separate, will cost the industry, consider moving 2's to 3
- Leafy spurge is widely distributed.
- Red Bartsia and Yellow star thistle could remain on Class 1
- Placement of species will depend on the definitions

WORKSHOP PARTICIPANTS

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